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August 27, 2024

Via ECF

MEMO ENDORSED

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States of America v. Gaurav Dhingra, 22-CR-180 (KPF)
Application to Redact Sensitive Material

Dear Judge Failla:

We represent Defendant Gaurav Dhingra in the above-referenced matter. We write pursuant to Your Honor's Individual Rule of Practice in Criminal Cases 7(E)(ii) ("Rule 7(E)(ii)") to request the Court's leave to redact certain passages and images in the Sentencing Memorandum and accompanying exhibits we are filing today on behalf of Mr. Dhingra because they contain personally sensitive information. Specifically:

- References to both substance abuse and violent child abuse in the Sentencing Memorandum on:
 - Page three
 - Page four
 - Page eleven (top)
 - Page seventeen
 - Page eighteen
- References to substance abuse in the Sentencing Memorandum on:
 - Page eleven (bottom)
 - Page twelve
 - Exhibit B, page three
- Reference on page fourteen to mental health, and while that passage arguably falls under Rule 7(E)(i), which includes "medical records, treatment and diagnosis" as

a category of information that the Court's leave is not needed to redact, we mention it here in an abundance of caution.

- Depictions of the faces of minor children in Exhibit G on:
 - Page two
 - Page three
 - Page four
 - Page six
 - Page seven
 - Page eight
 - Page nine

Pursuant to Rule 7(E)(ii), we have redacted these passages in the publicly-filed Sentencing Memorandum and will "bring a copy of those pages to the sentencing proceeding, marked to indicate what information has been redacted from the publicly filed materials, to give to the Court for filing under seal." In the copy we give to the Court we will highlight in yellow the redacted passages and shaded in gray the redacted faces.

We are available at the Court's convenience to discuss any matter relating to this request.

Very truly yours,

/s/

Priya Chaudhry

Cc: AUSA Patrick R. Moroney

Application GRANTED. The Clerk of Court is directed to file the unredacted sentencing submission and the accompanying exhibits under seal. The Clerk of Court is directed to terminate the pending motion at docket number 36.

Dated: August 28, 2024
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE